

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re	Chapter 11
CENTER CITY HEALTHCARE, LLC d/b/a HAHNEMANN UNIVERSITY HOSPITAL, <i>et al.</i> , ¹	Case No. 19-11466 (MFW)
Debtors.	(Jointly Administered)
CENTER CITY HEALTHCARE, LLC, d/b/a HAHNEMANN UNIVERSITY HOSPITAL, ST. CHRISTOPHER'S HEALTHCARE, LLC, TPS V OF PA, LLC, and SCHC PEDIATRIC ASSOCIATES, LLC,	
Plaintiffs,	
v.	Adv. No. 21-50896 (MFW)
DE LAGE LANDEN FINANCIAL SERVICES, INC.,	
Defendant.	Re: Docket Nos. 10, 24, and 31

**STIPULATION EXTENDING FACT
DISCOVERY DEADLINE FOR PLAINTIFFS ONLY**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs Center City Healthcare, LLC d/b/a Hahnemann University Hospital, St. Christopher's Healthcare, LLC, TPS V of PA, LLC, and SCHC Pediatric Associates, LLC ("**Plaintiffs**") and Defendant De Lage Landen Financial Services, Inc. ("**Defendant**"), by and through their undersigned counsel, that the non-expert fact discovery deadline including depositions of fact witnesses as set forth in the *Order Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Debtors*

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Center City Healthcare, LLC (3341), Philadelphia Academic Health System, LLC (8681), St. Christopher's Healthcare, LLC (8395), Philadelphia Academic Medical Associates, LLC (8165), HPS of PA, L.L.C. (1617), SCHC Pediatric Associates, L.L.C. (0527), St. Christopher's Pediatric Urgent Care Center, L.L.C. (6447), SCHC Pediatric Anesthesia Associates, L.L.C. (2326), StChris Care at Northeast Pediatrics, L.L.C. (4056), TPS of PA, L.L.C. (4862), TPS II of PA, L.L.C. (5534), TPS III of PA, L.L.C. (5536), TPS IV of PA, L.L.C. (5537), and TPS V of PA, L.L.C. (5540). The Debtors' mailing address is 216 North Broad Street, 4th Floor, Philadelphia, Pennsylvania 19102.

Pursuant to Sections 502, 547, 548 and 550 of the Bankruptcy Code entered by the Court on September 21, 2021 [Docket No. 10], as amended by the parties' *Stipulation Extending Pre-Trial Dates and Deadlines* [Docket No. 24] filed on May 19, 2022, and the parties' *Stipulation Extending Pre-Trial Dates and Deadlines* [Docket No. 31] filed on June 10, 2022, has expired with the following exceptions: (a) with respect to Defendant's obligations, if any, to produce documents responsive to Plaintiffs' written discovery and otherwise discoverable; (b) Plaintiffs may re-notice and complete the depositions of Charles McAllister and Rebecca Ricci; and (c) Plaintiffs' right to file motions with the Court seeking orders to compel Defendant with respect to exceptions (a) and (b), subject to Defendant's right to oppose any such motion(s). For the avoidance of doubt, the fact discovery period is not extended for Defendant in any way. The remaining discovery deadlines outlined in the parties' *Stipulation Extending Pre-Trial Dates and Deadlines* [Docket No. 31] filed on June 10, 2022 shall remain in effect.

[Signature page to follow]

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/s/ John D. Demmy

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Dated: August 1, 2022